

EXHIBIT H

ALISHA SINGLETON; January 31, 2019

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)
)
 PLAINTIFF,) NO. 3:17-CV-05806-RJB
)
 VS.)
)
 THE GEO GROUP, INC.,)
)
 DEFENDANT.)
)
)
)

DEPOSITION UPON ORAL EXAMINATION OF
ALISHA SINGLETON

10:00 A.M.

JANUARY 31, 2019

800 FIFTH AVENUE, SUITE 2000

SEATTLE, WASHINGTON



REPORTED BY: BETSY E. DECATER, RPR, CCR 3109



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ALISHA SINGLETON; January 31, 2019

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1 SEATTLE, WASHINGTON; JANUARY 31, 2019

2 10:00 A.M.

3 --oOo--

4
5 ALISHA SINGLETON,

6 sworn as a witness by the Certified Court Reporter,

7 testified as follows:

8
9 EXAMINATION

10 BY MS. CHIEN:

11 Q. Can you state your name for the record?

12 A. Alisha Singleton.

13 Q. And have you ever been previously deposed?

14 A. No.

15 Q. So I'm Marsha Chien. I'm one of the attorneys
16 for the State, and to my left is La Rond Baker, who's
17 also an attorney, and Caitie Hall, who's our legal
18 assistant. So I have a couple of housekeeping matters,
19 and then I'll just get into it.

20 I think probably your attorney told you this, but
21 the way depositions work is that it's all written
22 transcript. So they don't see any head nods or shakes.
23 So sometimes I might ask you to verbalize a head nod as
24 yes or no. And the other aspect is that no interrupting
25 when I am posing a question so that the record is really



1 Q. You mentioned that you get requests from detainee
2 workers for jobs.

3 Do you get requests from detainee workers for
4 specific jobs or just for any job?

5 A. It could be a variation of both. Some ask for
6 specific ones, some request for any work.

7 Q. Do you try to give detainee workers the job they
8 request?

9 A. Yes. It's a voluntary work program. So if
10 they're requesting a specific job to work voluntarily
11 and they're allowed to do that based on the requirements
12 of that area, then absolutely.

13 Q. Are some jobs more popular than others?

14 A. I wouldn't necessarily say so. It just depends.

15 Q. What does it depend on?

16 A. I get requests daily, so I just process them as I
17 receive them.

18 Q. Do you get more requests for kitchen than for pod
19 workers?

20 A. I couldn't quantify that.

21 Q. I don't need you to quantify it. I'm just asking
22 for more or less?

23 A. I don't know specifically. I receive requests
24 daily, so I don't know.

25 Q. So yesterday did you receive more requests for



1 assuming you create and you give them a copy, this is
2 the waiting list?

3 A. It's on the bottom of the actual detail list.

4 Q. So if they have a waiting list but they only have
5 the hard copy, they don't have access to your Excel
6 spreadsheet?

7 A. Correct.

8 Q. Who has access to that Excel spreadsheet?

9 A. I'm not sure who all would have access to it.

10 Q. Who uses it on a daily basis?

11 A. Me and Michael Heye.

12 Q. Anybody else?

13 A. Not that I'm aware of.

14 Q. Who told you to maintain a waiting list?

15 A. Per the ICE PBNDS.

16 Q. PBNDS instructs GEO to maintain a waiting list?

17 A. The ICE PBNDS instructs us to offer jobs in the
18 order that requests are received.

19 Q. And so did you -- and that necessarily required a
20 waiting list?

21 A. If a job is not available in that specific area,
22 then that would entail they have to go on the list for
23 the next opening to become available.

24 Q. Does the PBNDS require waiting lists for each job
25 as opposed to all of the jobs at once?



1 into your selection process?

2 A. No.

3 Q. Do you have the authority to ask about a detainee
4 worker's attitude and behavior?

5 A. I'm not a supervisor.

6 Q. This says, detainee selection, the work program
7 supervisor. Who's the work program supervisor?

8 A. There's not a specific supervisor. We run the
9 work program, there's two people in there. We have
10 never been designated as one or the other.

11 Q. So could you both be a voluntary work program
12 supervisor?

13 A. Correct.

14 Q. So I think this is referring to the work program
15 supervisor. So do you have the authority to ask about a
16 detainee's attitude and behavior?

17 A. Possibly.

18 Q. Can you turn to page 4, and it says Hours of
19 Work. In that section, it says, "Unexcused absences
20 from work or unsatisfactory work performance may result
21 in removal from the voluntary work program."

22 Who decides when somebody's work performance is
23 unsatisfactory?

24 A. As long as they show up and they do the job, then
25 that's deemed sufficient.



1 A. Correct.

2 Q. Why is there a difference between those two?

3 A. That would have been information that I received
4 as direct from my direct supervisor.

5 Q. So the Bill McHatton is the one telling you the
6 bathroom cleaners have to work during a specific time?

7 A. I'm not sure if it was Bill McHatton because I'm
8 not sure how far back the practice goes.

9 Q. But somebody in his position?

10 A. Yes.

11 Q. And then you said food servers; is that right?

12 A. Correct.

13 Q. And then is there laundry as well?

14 A. Pod laundry, correct.

15 Q. And what do the pod laundry folks do?

16 A. In the regular units, the male units, the pod
17 laundry workers, they're typically going to be
18 responsible for just distributing laundry when it comes
19 into the units. So the laundry goes out in their little
20 mesh bags to be cleaned and they just hand them to the
21 correct person.

22 Q. And these categories of pod porters, have those
23 been the same categories throughout your entire tenure
24 as classification officer?

25 A. I'm not sure. I can't specifically recall if



1 A. I don't recall. I don't think at the very
2 beginning that we did.

3 Q. Did you suggest a refusal to work form?

4 A. I don't recall. I don't recall when it was
5 created.

6 Q. Was it created in the last year?

7 A. No. It was prior to that.

8 Q. Last five years?

9 A. Possibly.

10 Q. Last ten years?

11 A. Possibly.

12 Q. Who told you to use the refusal to work form?

13 A. I don't recall. I don't recall when it was
14 created to be able to recall a conversation about the
15 usage of it.

16 Q. You just remember starting to use this refusal to
17 work form?

18 A. I just know it's a part of the voluntary work
19 program as of today.

20 Q. You see in the fifth up -- the fifth bullet point
21 up from the bottom and says "you cannot fire workers."
22 You see that?

23 A. Correct.

24 Q. Why can't you fire workers?

25 A. Because they're voluntary.



1 A. I'm not sure what you're asking as far as
2 removed.

3 Q. Have detainee workers ever been removed from
4 working in the voluntary work program?

5 I'm trying not to say fired because I think you
6 said you can't fire detainee workers. But I'm
7 assuming -- I'm asking whether or not detainee workers
8 have been removed from the voluntary work program?

9 A. There have been some detainees removed for
10 various disciplinary sanctions.

11 Q. Is that the only reason?

12 A. And refusing to work.

13 Q. And refusing to work?

14 A. Those are the only two times that I can recall at
15 the moment where they're taken off a detail.

16 Q. What about for poor performance?

17 A. No. I've never taken anybody off a detail due to
18 poor performance. If he didn't want to complete the job
19 and opted to refuse to work and complete the job, then
20 that was a choice he made.

21 Q. So when does something -- when is something poor
22 performance and when is something refusing to work?
23 What makes that decision?

24 A. As long as they show up and make a valid attempt
25 to do the job and it's completed and they come back the



REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was reserved; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 12th day of February, 2019.



BETSY E. DECATER, RPR
Washington Certified Court Reporter, CCR 3109
bdecater@yomreporting.com

